

## **Exhibit 2**

## Vincent Russo

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**From:** Bruce Brown <bbrown@brucepbrownlaw.com>  
**Sent:** Monday, April 15, 2019 6:04 PM  
**To:** Cross, David D.; Chapple, Catherine L.; Bryan Tyson; Vincent Russo; Burwell, Kaye  
**Cc:** Robert McGuire; Cary Ichter  
**Subject:** FW: Curling v Raffensperger - Third Party Subpoena for Morgan County Board of Elections  
**Attachments:** 20190415 CGG Third-Party Subpoena to Morgan County Served Copy.pdf

Counsel: please see below and the attached.  
Bruce

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**From:** "bbrown@brucepbrownlaw.com" <bbrown@brucepbrownlaw.com>  
**Date:** Monday, April 15, 2019 at 3:32 PM  
**To:** "chenry@hallboothsmith.com" <chenry@hallboothsmith.com>  
**Subject:** Curling v Raffensperger - Third Party Subpoena for Morgan County Board of Elections

Mr. Henry,

I represent the Coalition Plaintiffs in *Curling v. Raffensperger* (see 334 F. Supp. 3d 1303, 1327). I left you a phone message before lunch to let you know that I would be emailing the attached subpoena to you. Judge Totenberg has not issued a scheduling order which, we believe, will set a start date for discovery, but we wanted to give this to you right away to give you maximum opportunity to respond, and because the Court has made it clear that expedited discovery is expected. I will let you know as soon as we get a scheduling order from the Court.

Would you agree to accept service of the subpoena, without waiving other defenses or responses?

Thanks,

Bruce

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